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[Proposed] Attorney for Debtor.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	Case No: 14-17028-ABL
)	Chapter 7
ALETHA L. TOWNSON,)	
)	
)	Date: October 15, 2015
Debtors.)	Time: 11:00 am
)	

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION FOR TURNOVER
OF 60 SHARES OF MONSANTO STOCK HELD BY DEBTOR OR IN
ALTERNATIVE TO REQUIRE DEBTOR TO GET THE MONSANTO STOCK
RE-ISSUED BY A BROKERAGE FIRM OR MONSANTO**

ALETHA L. TOWNSON, ("Debtor"), by and through the Law Office of Timothy P. Thomas, LLC, respectfully responds to the Trustee's Motion for Turnover of Monsanto Stock by the Debtor.

POINTS AND AUTHORITIES

Debtor filed her Voluntary Petition under Chapter 7 of the U.S. Bankruptcy Code on October 21, 2014. Debtor received her discharge in this case.

Debtor listed all known assets on her petition, including possible ownership of 60 shares of Monsanto Stock. This stock was held by Debtor jointly with her late husband. At the time of the filing of the petition, Debtor did not have any means to identify or locate these shares. These shares were demanded to be turned over to the Trustee. Debtor has been searching for any

1 statement or identification of the stocks to assist the Trustee in good faith.

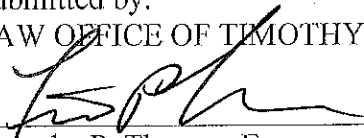
2 Debtor recently was able to locate copies of the stock certificates that identify the
3 individually numbered shares and marked with handwritten notes indicating that the certificates
4 were received in May 1995. Pursuant to the representations on the certificates, there are actually
5 75 shares that were issued at that time. The stock certificates have been surrendered to the
6 Trustee in connection with the filing of this response. A copy of the Receipt of Copy from the
7 Trustee is attached hereto as Exhibit "A".
8

9
10 The Debtor has cooperated and negotiated in good faith with the Trustee to resolve any
11 disputed issues in this case. She did not testify at the 341 meeting that she could locate the stock
12 certificates. In fact, she has always been clear that she was providing all information that she
13 had regarding the stock certificates. The Debtor was always willing to cooperate with the
14 Trustee's efforts to recover the stock.
15

16
17 WHEREFORE, Debtor respectfully requests that this motion for turnover be denied as
18 moot since the stock certificates, and all evidence of such stocks that are in Debtor's possession
19 has been turned over to the Trustee.

20 Dated this 29th day of September, 2015.

21
22 Submitted by:
23 LAW OFFICE OF TIMOTHY P. THOMAS, LLC

24 
25 Timothy P. Thomas, Esq.
26 Nevada State Bar No. 5148
27 1771 E. Flamingo rd. Suite B-212
28 Las Vegas, NV 89119
(702)227-0011
[Proposed] counsel for Debtor

CERTIFICATE OF SERVICE

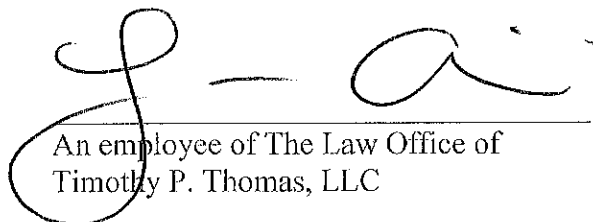
I HEREBY CERTIFY that service of the following: DEBTOR'S RESPONSE TO TRUSTEE'S MOTION FOR TURNOVER OF 60 SHARES OF MONSANTO STOCK HELD BY DEBTOR OR IN ALTERNATIVE TO REQUIRE DEBTOR TO GET THE MONSANTO STOCK RE-ISSUED BY A BROKERAGE FIRM OR MONSANTO

was served on this 30th of September, 2015, by:

Electronic service to the ECF service matrix and by depositing a true and correct copy of the above in a mailbox of the US Post Office, enclosed in a sealed envelope, postage prepaid thereon, addressed to the following interested parties:

U.S. Trustee Office
300 Las Vegas Blvd. South, #4300
Las Vegas, NV 89101

Submitted by:



An employee of The Law Office of
Timothy P. Thomas, LLC

EXHIBIT A

LAW OFFICE OF TIMOTHY P. THOMAS, LLC

1771 E. Flamingo Rd. Suite B-212
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September 29, 2015

Yvette P. Weinstein
6450 Spring Mountain Rd., #14
Las Vegas, NV 89146

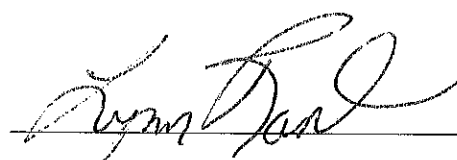
Re: ALETHA L. TOWNSON
Case No. 14-17028-ABL
Hearing: October 15, 2015 @ 11:00 am

RECEIPT OF COPY

I HEREBY CERTIFY that on the 29th day of September, 2015, I received a copy of
the **Original Monsanto Company Common Stock Certificates (7 certificates total)** for the
above mentioned client.

Stock Certificate No. that were delivered:

S242707
S232259
S175488
S163776
S168242
S249528
S258276



Employee to Yvette P. Weinstein